

# Exhibit B



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**SENT BY EMAIL**

September 19, 2024

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**Re: *Phi Theta Kappa v. HonorSociety.Org., Inc., No. 22-cv-00208-CWR-RPM***  
**HonorSociety Zendesk Customer Service Call Recordings**

Counsel:

Your August 29, 2024 letter expressed concern that HonorSociety's production may be deficient by failing to include customer service call recordings maintained by Zendesk. In response, HonorSociety contacted Zendesk to determine whether any HonorSociety customer service calls had been recorded. HonorSociety was assured by multiple Zendesk representatives that, because HonorSociety's "plan does not have a call recording feature," "there [are] no call recordings." Zendesk further confirmed that should HonorSociety upgrade its existing plan, that would enable the call recording feature "only for upcoming calls once the plan is upgraded." Attached to this letter is correspondence in which Zendesk repeatedly confirmed there were no call recordings.

Since the hearing with Judge Myers on September 17, 2024, HonorSociety has come across some evidence of call recordings despite Zendesk insisting there are none. HonorSociety is investigating the existence and scope of the recordings, whether they can be accessed and/or downloaded, and the burden for doing so.

Thank you,

NEWMAN LLP

A handwritten signature in dark ink, appearing to be "D. Linke", written over a light blue horizontal line.

Derek Linke

Encl.











